

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

Chuck Booms,)	
)	Case No. 1:23-cv-2099
Plaintiff,)	
)	Judge J. Philip Calabrese
vs.)	
)	Magistrate Judge Thomas M. Parker
Gray Media Group, Inc.,)	
)	
Defendant.)	

Joint Motion to Enter Stipulated Method for Conducting ESI Discovery

As stated in the parties' Rule 26(f) report (ECF #6), the parties have stipulated and jointly move the Court to enter the below stipulated method for conducting discovery of electronically stored information ("ESI"):

In response to document requests served under Fed. Civ. R. 34, the responding party shall conduct a reasonable and proportional search of all known custodial and non-custodial data sources believed to contain potentially relevant ESI. The responding party then will produce responsive and discoverable ESI in text-searchable PDF bates-labeled pages. Notwithstanding the foregoing, the responding party will produce computer files in native format if they do not convert to a reasonable readable format in PDF, *e.g.*, Microsoft Excel spreadsheets. A requesting party also may seek native files with metadata if a PDF version of a computer file lacks discoverable information that is likely to be present in the native file or metadata.

IT IS SO ORDERED.

Date

J. Philip Calabrese
United States District Judge

STIPULATED BY:

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